

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION  
*This document relates to:*  
All Cases

MDL 2804  
Case No. 17-md-2804  
Hon. Dan Aaron Polster

MOTION TO APPOINT JAYNE CONROY  
AS CO-LEAD COUNSEL

Co-Lead Counsel Joseph F. Rice and Paul T. Farrell, Jr. respectfully request that the Court appoint Jayne Conroy as Co-Lead Counsel in this MDL proceeding.

On January 4, 2018, the Court appointed Paul J. Hanly, Jr., Joseph F. Rice, and Paul T. Farrell, Jr. to be Co-Lead Counsel in this MDL. (ECF No. 37). Each has served in that capacity since that time.

As the Court is aware, Mr. Hanly recently passed away. Since the creation of this MDL, Ms. Conroy has been deeply involved in every aspect of the litigation, and the Court is no doubt very familiar both with Ms. Conroy and her work in this case. In addition to working closely with Mr. Hanly and the other Co-Lead Counsel, she has been extensively involved in discovery matters, settlement negotiations, and trial preparation. When the Court granted the motion to certify a Negotiation Class in this MDL, Ms. Conroy was appointed Co-Lead Negotiation Class Counsel. (ECF No. 2591). When Mr. Hanly became ill, Ms. Conroy stepped in to assist Mr. Hanly in carrying out his responsibilities as Co-Lead Counsel and has continued to do so following his passing.

Co-Lead Counsel Messrs. Rice and Farrell can think of no one better suited to carry on in Mr. Hanly's stead as Co-Lead Counsel in this MDL than Ms. Conroy. In addition to her involvement in this MDL, she has served in a leadership role in numerous other multidistrict litigations, as reflected in the declaration attached as Exhibit 1. The Plaintiffs' Executive Committee unanimously supports Ms. Conroy's appointment. Mr. Rice and Mr. Farrell have spoken with Ms. Conroy and she has consented to their request and joins in requesting that she be appointed Co-Lead Counsel.

Dated: June 1, 2021

Respectfully submitted,

*Plaintiffs' Co-Lead Counsel*

/s/ Joseph F. Rice

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 1, 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court's CM/ECF system.

/s/ Peter Weinberger  
Peter Weinberger